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Attorneys for Defendant
Mr. Garcia

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:20-cr-00181-JAM-1
Plaintiff,)
vs.) STIPULATION AND ORDER TO CONTINUE
) JUDGMENT AND SENTENCING
MICHAEL GARCIA.) Date: March 25, 2025
Defendants.) Time: 9:00 a.m.
) Judge: Hon. John A. Mendez

IT IS HEREBY STIPULATED and agreed by and between Acting United States Attorney Michele Beckwith, through Assistant United States Attorney Adrian Kinsella, counsel for Plaintiff; and Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmohammadi, counsel for Defendant Michael Garcia that Judgment and Sentencing currently set for March 25, 2025 at 9:00 be continued to **May 06, 2025, at 9:00 a.m.**

The parties specifically stipulate as follows:

1. By previous order, this matter was set for Judgment and Sentencing on March 25, 2025 at 9:00 a.m.
2. Mr. Garcia needs additional time to adequately prepare for Judgment and Sentencing. Informal Objections to the PSR were due February 25, 2025, however defense counsel fell ill and was unable to timely submit Mr. Garcia's objections.

3. The government does not object to Mr. Garcia's request and the parties, after consulting with U.S. Probation, stipulate to the following modified scheduled.

Draft PSR	completed
Informal Objections	April 8, 2025
Final PSR	April 15, 2025
Formal Objections	April 22, 2025
Response to Formal Objections	April 29, 2025
Judgment and Sentencing	May 6, 2025, at 09:00 a.m.

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: March 3, 2025

/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Mr. Garcia

Date: March 3, 2025

MICHELE BECKWITH
Acting United States Attorney

/s/ Adrian Kinsella
Adrian Kinsella
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, **ADOPTS** the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: March 04, 2025

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE